

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GRAHAM CHASE ROBINSON,

Plaintiff,

-against-

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

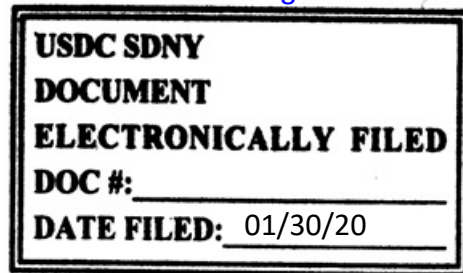
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KATHARINE H. PARKER, United States Magistrate Judge:

On January 30, 2020, the parties appeared for an Initial Case Management Conference. After review of the pleadings and consultation with the parties, the following Scheduling Order is entered pursuant to Rule 16 of the Federal Rules of Civil Procedure:

Pleadings and Parties. The parties may amend the pleadings or join additional parties until **April 30, 2020**.

Discovery. All fact discovery shall be completed by **October 29, 2020**. All expert discovery shall be completed by **January 21, 2021**.

Interim Discovery Deadlines. The parties shall exchange initial disclosures by no later than **February 13, 2020**. The parties shall produce initial sets of relevant documents identified and shall serve initial document requests by no later than **March 5, 2020**. The parties will exchange initial sets of interrogatories by no later than **March 12, 2020**. Responses thereto shall be due on **April 13, 2020**. Requests for admission shall be served by **September 24, 2020**. Responses thereto shall be due on **October 26, 2020**. Any final document requests and/or interrogatories shall be served by no later than **September 30, 2020**. All depositions shall be



completed by **October 29, 2020**. Interim deadlines may be adjusted by the parties without further order of the Court.

Status Conference. A status conference will be held on **March 19 at 10:00 a.m.** in Courtroom 17D, United States Courthouse, 500 Pearl Street, New York, New York.

Mediation. The parties are excused from the mediation process.

Rule 1 and Rule 26(b)(1). Counsel shall comply with Rule 1 and Rule 26(b)(1) in the conduct of discovery.

Document Requests. Counsel shall be fully familiar with their obligations under Rules 34 and 26(g) and consider and discuss ways to ensure compliance and minimize disputes regarding overbreadth and specificity of requests and responses. A failure to comply with this responsibility carries serious consequences. Requests for “any and all” documents on a broad topic are presumptively improper. Likewise, courts have held that an objection that does not appropriately explain its grounds is forfeited. *See, e.g., Wesley Corp. v. Zoom T.V. Prods., LLC*, No. 17-100212018, 2018 WL 372700, at *4 (E.D. Mich. Jan. 11, 2018); *Fischer v. Forrest*, No. 14 Civ. 01304, 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (“[A]ny discovery response that does not comply with Rule 34’s requirement to state objections with specificity (and to clearly indicate whether responsive material is being withheld on the basis of objection) will be deemed a waiver of all objections (except as to privilege).”).

Discovery Disputes. The parties shall follow the Court’s Individual Procedures with respect to any discovery disputes. *See* <https://nysd.uscourts.gov/hon-katharine-h-parker>.

Summary Judgment Motion. Although the parties do not presently anticipate a dispositive motion, any party that wishes to file a motion for summary judgment shall file a pre-motion letter with the Hon. Laura T. Swain by no later than October 20, 2019 in accordance with Judge Swain's Individual practices. See <https://nysd.uscourts.gov/hon-laura-taylor-swain>.

SO ORDERED.

DATED: New York, New York
January 30, 2020

A handwritten signature in blue ink that reads "Katharine H. Parker". The signature is written in a cursive, flowing style.

KATHARINE H. PARKER
United States Magistrate Judge